

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
TRENTON VICINAGE**

ASSOCIATION OF NEW JERSEY
RIFLE & PISTOL CLUBS, INC.,
BLAKE ELLMAN, and ALEXANDER
DEMBOWSKI,

Plaintiffs,

v.

GURBIR GREWAL, in his official
capacity as Attorney General of New
Jersey, PATRICK J. CALLAHAN, in
his official capacity as Superintendent
of the New Jersey Division of State
Police, THOMAS WILLIVER, in his
official capacity as Chief of Police of
the Chester Police Department, and
JAMES B. O'CONNOR, in his official
capacity as Chief of Police of the
Lyndhurst Police Department,

Defendants.

Hon. Peter G. Sheridan, U.S.D.J.
Hon. Lois H. Goodman, U.S.M.J.

Docket No. 3:18-cv-10507-PGS-LHG

**DECLARATION OF MAJOR
GEOFFREY NOBLE**

I, Geoffrey Noble, am competent to state, and declare the following, based on my personal knowledge:

1. I am a citizen of the United States and a resident of New Jersey.
2. I am over 21 years of age.

3. I am the Commanding Officer of the Forensic and Technical Services Section of the New Jersey State Police and have been so employed since 2016.
4. I received a Bachelor of Arts degree in Criminal Justice from Seton Hall University in 1995. In 2002, I received a Master's Degree in Education from Seton Hall University.
5. Since 1995, I have been employed by the New Jersey State Police (NJSP). During my career, I have held a number of different assignments with the NJSP. I was assigned to Patrol from 1995 to 2001. From 2001 to 2003, I was assigned to Organized Crime and Narcotics Investigations.
6. Between 2003 and 2016, I was assigned to Major Crimes, Homicide and Officer-Involved Shootings. During my time in Major Crimes, I was a member of the Police Shooting Response Team for the New Jersey Office of the Attorney General.
7. I am the former President of the New Jersey Homicide Investigators Association. I am also on the Forensics Committee of the Association of State Criminal Investigative Agencies.
8. I am trained in and qualified to carry several types of firearms, including: Heckler & Koch P7M8 (9 mm semi-automatic pistol); Smith & Wesson (9

mm pistol); Sig Sauer (9 mm); Glock (9 mm semi-automatic pistol); Remington Model 870 shotgun; and a Benelli 60 (12-Gauge shotgun).

9. Since 2016, I have been the Commanding Officer of the Forensic and Technical Services Section. My responsibilities as Commanding Officer include overseeing the recovery and forensic analysis of firearms, ammunition, and magazines, involved in crimes in New Jersey.
10. Throughout my career, I have been involved in over 100 officer-involved shooting investigations. Additionally, I have been involved in over 500 violent crime investigations, many of which involved semi-automatic handguns and magazines carrying more than 10 rounds.
11. I have been called to testify before grand juries on the use of deadly force over 50 times.
12. In my capacity as Commanding Officer of the Forensic and Technical Section, I oversee the use of the National Integrated Ballistic Information Network (NIBIN) by NJSP. NIBIN provides the NJSP with the ability to quickly determine whether a piece of recovered ballistic evidence came from a firearm that had been previously used in another crime. Of the over 2000 hits NJSP received over the last 5 years, roughly 30%-40% of the hits link shootings from different jurisdictions.

13. For example, NIBIN linked the ballistic evidence recovered in the June 25, 2014 shooting of Brendan Tevlin, an investigation I was personally involved in, to other prior shootings in Seattle by the same perpetrator, Ali Muhammad Brown.
14. Large capacity magazines allow semi-automatic weapons to fire 10 or more rounds of ammunition without the need for the shooter to stop and reload the weapon.
15. Because large capacity magazines enable a shooter to fire repeatedly without needing to reload, they increase a shooter's ability to injure individuals in mass shootings.
16. It is for this reason that I believe large capacity magazines are most appropriate in law enforcement and military settings in which properly trained officers are tasked with working in highly dangerous environments. In my personal opinion, law enforcement officers should be equipped with the weapons needed to protect the public.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: July 5, 2018

/s/ Geoffrey Noble
Geoffrey D. Noble